

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**STATEMENT WITH RESPECT TO
SENTENCING FACTORS
Case No. 17-CR-00190**

G. STEVEN PIGEON,

Defendant.

JUSTIN D. GINTER, ESQ., being duly sworn, deposes and says:

I, along with Paul J. Cambria, Jr., Esq., represent the Defendant G. Steven Pigeon. I make this affirmation in accordance with the requirements of Section 6A1.2 of the Sentencing Guidelines, "Statement of Defendant with Respect to Sentencing Factors," as promulgated by the United States Sentencing Commission. I have reviewed the Presentence Report ("PSR") with Mr. Pigeon, and I spoke with Probation Officer Tina Blackman. The parties have agreed that certain changes will be made to the PSR.

Therefore, the defendant adopts the PSR in anticipation that the changes discussed will be made and reserves the right to present any and all relevant mitigating evidence through its sentencing memorandum and at sentencing to advocate for a sentence that is sufficient, but not greater than necessary to achieve a fair and just resolution.

DATED: November 30, 2021
Buffalo, New York

/s/Justin D. Ginter, Esq.
JUSTIN D. GINTER, ESQ.
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